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*Of Attorneys for Defendants
Lake Oswego School District and
Lake Oswego School Board*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

JOHN PARKS,

Plaintiff,

v.

**LAKE OSWEGO SCHOOL DISTRICT;
LAKE OSWEGO SCHOOL BOARD;
OREGON SCHOOL ACTIVITIES
ASSOCIATION; PORTLAND PUBLIC
SCHOOLS; and MARSHALL HASKINS,
individually and *in his representative
capacity for OREGON SCHOOL
ACTIVITIES ASSOCIATION and
PORTLAND PUBLIC SCHOOLS,***

Defendants.

Case No. 3:24-cv-1198-JR

**LAKE OSWEGO SCHOOL DISTRICT
AND LAKE OSWEGO SCHOOL
BOARD'S MOTION FOR EXTENSION
TO RESPOND TO FIRST AMENDED
COMPLAINT**

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LR 7-1(a) CERTIFICATION

Pursuant to LR 7-1, the undersigned certifies that counsel for defendants Lake Oswego School District and Lake Oswego School Board conferred with counsel for plaintiff and plaintiff does not oppose this motion.

MOTION

Defendants Lake Oswego School District and Lake Oswego School Board ("Moving Defendants") respectfully request an extension of time, up to and including November 19, 2024, to respond to plaintiff's First Amended Complaint. Moving Defendants request this extension because Moving Defendants lead counsel, Karen O'Kasey, is currently in the midst of a two-week trial in *Laura Minthorne v. Legacy Health, et. al.*, Multnomah Co. Case No. 21CV49286. Additionally, Ms. O'Kasey and Moving Defendants' counsel, Taylor Lewis, have a four-day trial beginning on November 12, 2024, in *Marie Tyvoll v. City of Portland et. al.*, 3:20-cv-01878-IM (D. Or.).

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This motion is made in good faith and not for purposes of delay. Plaintiff filed the First Amended Complaint on October 7, 2024, and this is the Moving Defendants' first request for an extension. Moving defendants bring this motion without waiving any potential defense.

DATED this 29th day of October, 2024.

HART WAGNER, LLP

By: /s/ Taylor B. Lewis
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*Of Attorneys for Defendants
Lake Oswego School District and
Lake Oswego School Board*

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of October, 2024, I served the foregoing **LAKE OSWEGO SCHOOL DISTRICT AND LAKE OSWEGO SCHOOL BOARD'S MOTION FOR EXTENSION TO RESPOND TO FIRST AMENDED COMPLAINT** on the following parties at the following addresses:

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Of Attorneys for Plaintiff

by electronic means through the Court's Case Management/Electronic Case File system.

/s/ Taylor B. Lewis

Taylor B. Lewis